## Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165

ctucker@faillacelaw.com

Facsimile: (212) 317-1620

Telephone: (212) 317-1200

June 13, 2019

## VIA ECF

Hon. Analisa Torres United States District Judge Daniel Patrick Moynihan United States Courthouse Courtroom: 15D 500 Pearl St. New York, NY 10007-1312

Re: <u>Jimenez et al v. 23 Innovations Inc. et al</u>

CIVIL DOCKET FOR CASE #: 1:18-cv-10749-AT

Your Honor:

The undersigned submits the instant letter to request an extension of time to file a motion for default judgment.

The Court originally set the deadline to move for default judgment by June 19, 2019. See Dkt. #89 (Court Order). The plaintiffs request the extension in order to draft eight declarations for the plaintiffs, to schedule the eight plaintiffs to come to our office to review them with translations and sign them in connection with the default motion. No previous requests were granted or denied. No adversary has appeared or answered in this action. No other scheduled dates would be affected by an extension to July 19, 2019.

The undersigned thanks the Court for its attention to this matter.

Respectfully submitted,

<u>/s/ Clifford Tucker</u> Clifford R. Tucker